

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ROSS UNIVERSITY SCHOOL OF MEDICINE, LTD., :  
:   
Plaintiff, :  
:   
- against - : 09 Civ. 1410 (KAM) (RLM)  
:   
BROOKLYN-QUEENS HEALTH CARE, INC. and :  
WYCKOFF HEIGHTS MEDICAL CENTER, :  
:   
Defendants. :  
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**JOINT STATUS REPORT**

On April 15, 2013, counsel for the parties – together with Ramon Rodriguez, the CEO of Wyckoff Heights Medical Center (“Wyckoff”), and Bill Hughson, the President of DeVry’s Medical Group, the parent company of Plaintiff Ross University School of Medicine, Ltd. (“Ross”) – participated in a settlement conference presided over by the Court. Following the conference, the Court issued an Order providing that “Wyckoff will make its financial records available for inspection, subject to a confidentiality agreement,” and that the “parties shall file a status report by May 20, 2013.” In accordance with that Order, Wyckoff’s counsel has been authorized to provide this joint status report on behalf of both Ross and Wyckoff. The parties report that the status is as follows.

The parties have agreed to a Confidentiality Agreement, Wyckoff has provided to Ross financial records, and Ross has engaged a financial consultant to assist in the review of those records. The parties’ discussions are ongoing.

The parties respectfully request that the Court continue to hold in abeyance the briefing schedule for Ross’s motion for reconsideration, and other proceedings in the case, pending completion of the financial record review and any subsequent settlement discussions, with the

parties to provide an updated status report to this Court within 30 days of this letter, or on such other date as instructed by the Court.

A copy of the Confidentiality Agreement is enclosed. The parties respectfully request that the Agreement be "So Ordered" by the Court.

Dated: New York, New York  
May 20, 2013

Respectfully submitted,

K&L GATES LLP

By: /s/ Walter P. Loughlin

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